

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

v.

DEVOS LTD. d/b/a Guaranteed
Returns, et al.

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CRIMINAL ACTION

NO. 14-574 (PBT)

DEFENDANTS' PRETRIAL MOTIONS

For the reasons set forth in the accompanying Memorandum of Law and supporting declarations of Douglas E. Grover, Toni Ann Meadows, Dean Volkes, and Donna Fallon, Defendants Devos Ltd. d/b/a Guaranteed Returns, Dean Volkes and Donna Fallon respectfully move this Court for: (I) suppression of all evidence seized pursuant to constitutionally defective search warrants and a *Franks* hearing on the same; (II) dismissal of Count 54 of the Superseding Indictment charging conspiracy to launder money; (III) a bill of particulars; (IV) release of assets currently subject to pretrial seizure; (V) unsealing of court records concerning the guilty pleas of two known witnesses cooperating with the government; and (VI) prompt disclosure of *Brady* and 404(b) material.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, William C. Komaroff, Esquire, hereby certify that the following documents have been filed electronically and are available for viewing and downloading from the Electronic Case Filing system: (1) Defendants' Pretrial Motions; (2) the Declaration of Toni Ann Meadows and exhibits thereto; (3) the Declaration of Dean Volkes; and (4) the Declaration of Donna Fallon. Notice has been sent through the ECF system to counsel of record, who have all consented to electronic service, including Assistant United States Attorneys Nancy Rue and Patrick Murray.

Dated: New York, New York
March 18, 2016

/s/ William C. Komaroff

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